

**LAW OFFICE OF DIANE MCFADIN**

LICENSED IN NEW YORK AND TEXAS

11 BROADWAY, SUITE 715 NEW YORK, NY 10004  
DMCFADIN@MCFADINLAW.COM

DIANE MCFADIN

TEL 646.723.2757  
FAX 212.943.1238

November 30, 2007

**Via Facsimile and U.S. Mail**

Hon. Steven C. Robinson  
United States District Court  
300 Quarropas St., Room 633  
White Plains, NY 10601

MEMO ENDORSED

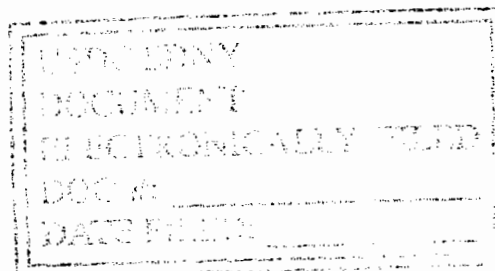
Re: *Willis v. LandAmerica Onestop, Inc., et al.*  
Index No.: 2007-CV-3646 (SCR)

Dear Judge Robinson:

I represent the plaintiff, Mr. Bennie Willis, in the above captioned case. By this letter, plaintiff requests an adjournment of approximately 60 days on all scheduled deadlines set forth in the Civil Case Discovery Plan and Scheduling Order, dated July 20, 2007. Pursuant to your individual practices, please find attached a proposed Revised Scheduling Order outlining proposed dates for all upcoming deadlines. Specifically, plaintiff seeks an adjournment of the deadlines: for depositions to be completed from December 14, 2007 to February 15, 2008, for service of any further interrogatories from January 15, 2007 to March 14, 2008, for service of any Requests to Admit from January 15, 2007 to March 14, 2008, for all discovery to be complete from February 15, 2008 to April 18, 2008. Counsel for all remaining parties in this action have consented to these changes.

To date, the parties have commenced discovery but have yet to begin depositions. However, the parties have begun to discuss a possible settlement. It is the sincere hope of all parties in this case that by extending the deadlines, the parties may agree on terms that may make settlement more likely. Plaintiff made one previous request (which was granted) for adjournment for me to familiarize myself with the case and prepare and serve discovery requests upon the defendants from September 14, 2007 to September 28, 2007. There have been no previous requests for adjournment of the dates at issue in this correspondence, namely that for completion of depositions, service of additional interrogatories, service of any Requests to Admit and for the completion of all discovery.

By copy of this letter, counsel for defendants are being served with copies of this document as indicated below.



Hon. Steven C. Robinson  
November 30, 2007  
Page 2 of 2

Respectfully submitted,



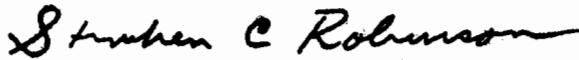
Diane McFadin  
Attorney for Plaintiff Willis

Discovery deadlines to be  
Adjourned to the following dates:

Depositions to be completed by 2/15/08  
Further interrogatories to be served by 3/14/08  
Requests to admit to be served by 3/14/08  
All discovery to be completed by 4/18/08.

Also adjourn pretrial conference currently scheduled  
for 2/8/08 to 4/25/08 at 10:00 AM.

## APPLICATION GRANTED



HON. STEPHEN C. ROBINSON

12/11/07

cc w/ enclosures:

David M. Satnick, Esq.  
John Piskora, Esq.  
Loeb & Loeb, LLP  
345 Park Avenue  
New York, NY 10154  
Attorneys for Defendant Lawyers Title Insurance Corp.

Thomas W. Hyland, Esq.  
Brett A. Scher, Esq.  
Justin R. Leitner, Esq.  
Wilson, Elser, Moskowitz, Edelman & Dicker LLP  
150 East 42<sup>nd</sup> Street  
New York, NY 10017  
Attorneys for Defendant Acranet